



May 15, 2018

Air Resources Board

1001 I Street

Sacramento, CA 95814

Dear ARB Staff:

We thank you for the opportunity to comment on the Greenhouse Gas Reduction Fund Funding Guidelines. Leadership Counsel for Justice and Accountability ("Leadership Counsel") works alongside disadvantaged communities of color throughout the San Joaquin Valley and Eastern Coachella Valley. We offer the following recommendations to ensure California's Climate Investments do not negatively impact already overburdened communities but provide them with real benefits and address their needs.

AVOIDING AND MINIMIZING SUBSTANTIAL BURDENS

We appreciate the addition of III.C.7 to the Guiding Principles, but believe this, as well as the other Guiding Principles, must be a requirement for all Climate Investment projects rather than simply recommendations. We also believe that "*or minimize*" in III.C.7 significantly weakens this recommendation and suggest that it be omitted.

We are concerned that certain projects, including dairy digesters, result in negative localized impacts to groundwater sources and air quality. We believe that ARB must include stronger language in the Funding Guidelines and oversight to agencies to ensure that technologies and programs selected to be part of the California Climate Investment programs do not adversely impact the communities they are statutorily required to benefit. In addition to greenhouse gas reduction, Climate Investments must also prioritize the reduction of toxic air contaminants and criteria air pollutants.

There is no environmental analysis of the impacts of the digestion process itself. Upon reviewing the applications of 2017 Dairy Digester Research and Development Program grantees, air quality benefits outlined by each of the applicants are simply attributed to the emission reductions from the usage of heavy duty natural gas vehicles. In fact, some projects include the flaring of methane gas. Additionally, many digester projects involve an increase in dairy herd size, and yet applicants do not provide a robust analysis of the potential impacts to air quality, and water quantity and quality from herd expansion and land application of digestate. We believe ARB must direct agencies to require more stringent environmental life-cycle analyses of projects to determine their air and water quality impacts.



A Tides Center Project

TECHNICAL ASSISTANCE AND ACCESSIBILITY OF PROGRAMS

While programs exist to provide communities with technical assistance for project applications, outreach to these communities about the availability of TA programs is not robust. We suggest that ARB and other agencies providing TA specifically outreach to overburdened, disadvantaged communities. ARB can also establish close relationships with community-based organizations throughout the state to assist with disseminating information to residents.

The Funding Guidelines should also include a provision that requires applicants and agencies to consider the income level of communities applying for projects. Many small, rural communities, for example, are not able to contribute funds for the project up-front and are therefore ineligible. The capacity of local governments can also create a barrier to applying for projects, and ARB and administering agencies must work closely with community groups and organizations to ensure that smaller low-income communities can compete with larger, more urban ones.

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Thank you for your consideration of these comments. We look forward to continuing to work with ARB staff to revise the Funding Guidelines

Sincerely,

Nikita Daryanani

Policy Coordinator